

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
IME WATCHDOG, INC.,

Plaintiff,

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,  
GREGORY ELEFTERAKIS, ROMAN POLLAK,  
ANTHONY BRIDDA, IME COMPANIONS LLC,  
CLIENT EXAM SERVICES LLC, and IME  
MANAGEMENT & CONSULTING LLC,

Defendants.  
-----X

Case No.: 1:22-cv-1032 (PKC) (JRC)

**DECLARATION OF  
CARLOS ROA IN SUPPORT OF  
PLAINTIFF'S MOTION TO FILE  
DOCUMENTS UNDER SEAL**

Carlos Roa declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the following is true and correct:

1. I am employed by the Plaintiff IME WatchDog, Inc. ("IME WatchDog") in this case.

2. I am familiar with all the facts and circumstances heretofore had herein based upon my personal knowledge.

3. On May 1, 2024, Giant Partners Inc. ("GP") produced documents in response to a subpoena IME WatchDog served on it.

4. Among the documents produced by GP was a LinkedIn accelerator spreadsheet which was submitted to this Court on June 19, 2024 under seal as Exhibit B to the Declaration of Emanuel Kataev (ECF Docket Entry 355). This document lists, *inter alia*, 228 of Plaintiff's customers on the Enjoined Customers List (ECF Docket Entry 180-7) and contains data related to Giant Partners' efforts in contacting said customers at the behest of Defendants and non-parties, IME Legal Reps and Eugene Liddie.

5. I reviewed Exhibit B to the Declaration of Emanuel Kataev and then created

Exhibit D to the Declaration of Emanuel Kataev which identifies only the 228 customers of Plaintiff that are contained on Exhibit B to the Declaration of Emanuel Kataev who are on the Enjoined Customers List.

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 19, 2024.

  
Carlo Roa

*Sworn to before me  
on June 19, 2024*

